

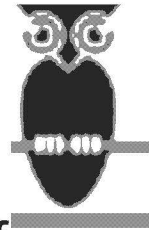
Exhibit 52

Quarterly Compliance Report to the Board of Directors: What you must know about the Sunshine Act

Bert Weinstein
Vice President, Corporate Compliance
July 25, 2013



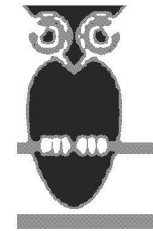
What Board Members *Must* Know



- August 1st: Purdue must report payments or other transfers of value (“Payments”) made to physicians and teaching hospitals
- Payments include: meals, gifts, educational items, speaking and consulting fees, payments for research activities such as CROs, grants, and more...
- CMS will post Payments information on a public website 9/30/14; physicians and teaching hospitals will have opportunity to review and dispute data in advance
- All Purdue employees, certain contractors, **and Board members** will need to accurately record and report any such Payments
- Not Reportable: Payments to Purdue employee-physicians; physicians without active licenses; non-business, personal Payments are not covered

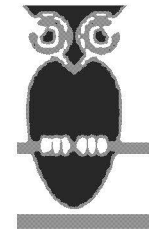


Complying with the Sunshine Act



- Purdue has developed a highly automated system and departmental procedures to collect and report Payments (as few manual entries as possible = less human error)
- Many people at Purdue from affected departments have been deeply involved in this effort for over two years
- Live training sessions have been held with employees
- Web-based training for all employees upcoming
- Reminder cards distributed
- Independent audit of system readiness by Navigant Consulting underway

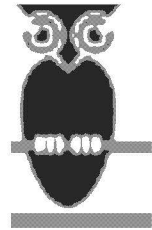




“Back-up Slides”



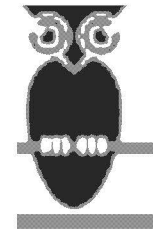
Applicable Manufacturer Defined



- Applicable Manufacturers are entities that have a physical location or otherwise conduct activities in the U.S., and either:
 - Manufacture Federally reimbursed products; or
 - Are under common ownership with an entity that manufactures such products and provide a service necessary or integral to the manufacturing, marketing, sale, promotion, or distribution of such products
- Some “tricky” examples of Applicable Manufacturers:
 - A foreign manufacturer selling product in the U.S. through an agent
 - A U.S.- based affiliate that produces active ingredient for a sister company that is an Applicable Manufacturer



Covered “Payments” Included

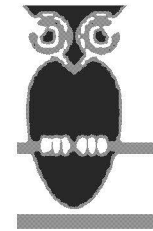


Examples of Payments to be reported:

- Meals during office visits or speaker programs
- “Educational” items and materials, if not for patient use
- Consulting and Speaker fees, and related expenses (travel, lodging, meals...)
- Educational and research grants
- Payments and in-kind items related to research and development activities (but with delayed publication provision for payments related to products in development)
- Exhibits, Conventions, Product Theaters



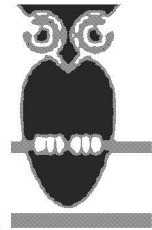
“Payments” Not Covered



- Applicable Manufacturers are not required to report :
 - Samples, coupons, and vouchers for patient use
 - Educational materials that directly benefit patients
 - In-kind items used for the provision of charity care
 - Payments or items less than \$10, unless the aggregate amount provided to the physician exceeds \$100/year
 - Food and beverages at large scale medical conferences
 - Payments made solely in the context of personal relationships, i.e., non-business/social
 - Discounts and rebates



Reporting Requirements Include

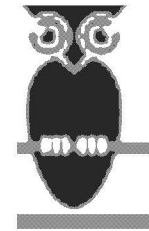


For each Physician or Teaching Hospital Payment, must *separately* report the following information:

- First Name, Last Name, Middle Initial, suffix
- Primary business address
- Specialty
- National Provider Identifier #
- Amount of payment
- Date each payment made
- Form of payment
- State License Number
- State(s) of Licensure
- Physician designation (e.g., MD, DO)
- Nature and purpose of payment
- Name of the product(s) to which the payment relates
- NDC number(s) for each product to which the payment relates



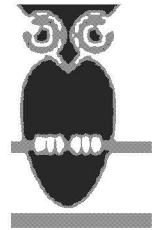
Physician Ownership Reporting



- Applicable Manufacturers must report to CMS all “ownership and investment interests” that were held by a physician or an immediate family member of a physician during the preceding calendar year
 - BUT, not as to physicians who are employees of the Applicable Manufacturer



Pre-Posting Review



Physicians and teaching hospitals will have the opportunity to review Payments data at least 45 days before website posting

- May formally initiate a dispute with the manufacturer
- If disputed, the manufacturer and physician are to attempt to resolve the dispute
- If the dispute is not resolved before CMS publicly posts the data, CMS will post the data as reported by the manufacturer and mark it “disputed”

Attention to the accuracy of our systems for record-keeping has been significant - to avoid disputes with our customers, or to validate Payments in the event of disputes; earlier-than-required pre-reviews of data will be pushed out to leading consultants

